

JPMorgan Chase Bank N.A is filing a Suspicious Activity Report (SAR) due to cash deposit and check activity which is indicative of the operation of a prohibited business (Escort Service) occurring in consumer checking account # 198523802 held solely in the name of LIDIA PAVLOVA. The reportable activity consist of cash deposits from a unknown source which are conducted a multiple branch and ATM locations in Los Angeles and Beverly Hills, CA., along with incoming check deposits made payable to cash originating from JPMC client BARTON LOUIS BUCHALTER. The SAR will be filed in the amount of \$81,225.00 representing the above mentioned cash and check deposits occurring between the dates of 08/10/2017 and 12/01/2017.

Consumer Checking Account 198523802 was opened on 08/10/2017 and is solely owned by LIDIA PAVLOVA who is a Non-Resident Alien from Russia currently residing in Los Angeles, CA. LIDIA PAVLOVA has been a client of JPMC since 08/10/2017 with bank records indicating the client is employed as a Freelance Photographer. However Account transactions revealed the client may also be operating as an Escort.

BARTON LOUIS BUCHALTER is a US citizen residing in Woodland Hills, CA and the owner and lawyer at BARTON L BUCHALTER ESQ. BARTON LOUIS BUCHALTER has maintained a relationship with JPMC since 10/28/2016.

The review found the following suspicious activity.

During the review of account 198523802, (23) cash deposits were conducted totaling \$34,825.00 between the dates of 08/10/2017 and 12/01/2017. The cash deposits range between \$150.00 and \$4,570.00. The majority of the cash deposits occur between Thursday and Saturday night at ATM locations in Los Angeles and Beverly Hills. Accompanying the cash deposits were (12) check deposits made payable to cash which originated from a BARTON L BUCHALTER's JPMC checking account number 700858611 and account 8000096225 drawn on Comerica Bank. These checks ranged between \$800.00 and \$6,000.00

Funds from the account are seen being used towards multiple debit card purchase to Lyft and MPF. Further review of the MPF revealed the business to be operating as an Escort advertisement service Eros Ads per the website erosads.com.

LIDIA PAVLOVA was contacted per a request for information sent on 12/11/2017 to inquire about the multiple cash deposits and the incoming checks from BARTON L BUCHALTER. Per the inquiry request LIDIA stated she was a photographer and cash and checks were from clients.

Additionally BARTON L BUCHALTER was contacted per a request for information sent on 12/06/2017 to also inquiry about the checks. BARTON L BUCHALTER stated the checks made to cash were to his "Girlfriends". The inquiry dates will not be included in the suspicious date range.

Based upon contradicting inquires as to the purpose of the checks, multiple same day and consecutive day cash deposits occurring each weekend, checks from a unrelated individual (BARTON L BUCHALTER) with funds being used towards Lyft and Escort advertising, it appears our client LIDIA PAVLOVA is operating in a prohibited business as an escort and therefore the above mentioned cash and check deposits will be reported in the SAR filing.

Details of the transactions can be found in the attached CSV file.

Supporting documentation associated with this report (SAR #: SAR_NA_69712330) includes, but may not be limited to, documents maintained or identified in case file # CASE_AML_NA_63814758 and can be retrieved upon request. Upon the appropriate and validated request of a regulator or law enforcement agency, supporting documentation will be provided. SAR #: SAR_NA_69712330 Case #: CASE_AML_NA_63814758